

Pro Se I (Rev. 12/16) Complaint for a Civil Case

UNITED STATES DISTRICT COURT

for the

Western District of Virginia

Civil Division

CLERK'S OFFICE U.S. DISTRICT COURT
AT HARRISONBURG, VA
FILED

NOV 17 2022

BY: [Signature] CLERK
DEPUTY CLERK

Soulsby II, Rodney

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Vint, Ashlyn D.

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Case No.

5:22-cv-00069

(to be filled in by the Clerk's Office)

Jury Trial: (check one) ☒ Yes ☐ No

COMPLAINT FOR A CIVIL CASE

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Soulsby II, Rodney
Street Address	405 14 th Ave.
City and County	Vero Beach
State and Zip Code	FL, 32962
Telephone Number	540-447-4297
E-mail Address	RSoulsbyii@gmail.com

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B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (*if known*). Attach additional pages if needed.

Defendant No. 1

Name	Vint, Ashlyn D.
Job or Title (<i>if known</i>)	N/A
Street Address	18 Forest Springs Dr.
City and County	Stuarts Draft
State and Zip Code	VA 24477
Telephone Number	540-480-0249
E-mail Address (<i>if known</i>)	AshlynMarrs@gmail.com

Defendant No. 2

Name	
Job or Title (<i>if known</i>)	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address (<i>if known</i>)	

Defendant No. 3

Name	
Job or Title (<i>if known</i>)	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address (<i>if known</i>)	

Defendant No. 4

Name	
Job or Title (<i>if known</i>)	
Street Address	
City and County	
State and Zip Code	
Telephone Number	

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E-mail Address *(if known)* _____**II. Basis for Jurisdiction**

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*

☐ Federal question

☒ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

B. If the Basis for Jurisdiction Is Diversity of Citizenship**1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, *(name)* Soulsby II, Rodney, is a citizen of the
State of *(name)* Virginia.

b. If the plaintiff is a corporation

The plaintiff, *(name)* _____, is incorporated
under the laws of the State of *(name)* _____
and has its principal place of business in the State of *(name)* _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)**a. If the defendant is an individual**

b. If the defendant is a corporation

The defendant, (name) _____, is incorporated under the laws of the State of (name) _____, and has its principal place of business in the State of (name) _____.

Or is incorporated under the laws of (foreign nation) _____, and has its principal place of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:

VA Code Title 8.01 Article 4 Defamation, tends to limit the maximum allowable damages at \$300,000.00 for this type of civil claim.

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

On November 21, 2021 defendant wrote an exemplicative internet/social media post claiming the plaintiff was:

A) A RAPIST- having sexually assaulted her- although there has never been a police-report or conviction of such and no mention has ever been made in criminal or civil court proceedings to include during divorce proceedings in 2014-2016 and in child custody proceedings in 2014-current.

B) A LIAR- though there are no complaints or filings for perjury, slander, libel, or defamation against plaintiff.

C) DEADBEAT FATHER- although the father has always been part of the child's life and plaintiff was granted primary physical custody of the minor child on August 05, 2022 by a Virginia state court.

D) DOES NOT PAY CHILD SUPPORT- although bank statements of the Plaintiff and Defendant show otherwise.

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

Plaintiff seeks the sum of \$15,00.00 in actual expenses related to the actual costs associated with bringing forth this action and an additional \$285,000.00 in punitive damages for the defamatory comments of the defendant as those actions are something the plaintiff and defendant's biological 10yr. old child will one day read, and the Plaintiff will now be forced to bear the burden of helping the child decipher those comments and all other future comments made by other family members of the defendant or anyone else who has read such claims and approaches the child and or the plaintiff; such unwarranted comments and claims made by the defendant have created a constant stress on the Plaintiff causing personal physical ailments such as but not limited to: recurring sleepless nights, panic attacks, weight gain and weight loss, high blood pressure, and inability to stay focused at times on day to day life and just be afforded the ability to live normally and peacefully without fear of prejudice.

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 11-14-2022

Signature of Plaintiff

Printed Name of Plaintiff

Rodney Saulsby II
Rodney Saulsby II

B. For Attorneys

Date of signing: _____

Signature of Attorney

Printed Name of Attorney

Bar Number